

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No: 18-01704 RNO
Bernadette A. Ebert-Johnson	: Chapter 13
	:
U.S. Bank National Association, not in its	:
individual capacity but solely as trustee for the	:
RMAC Trust, Series 2016-CTT c/o Rushmore	:
Loan Management Services	:
Movant	:
	:
vs.	:
	:
Bernadette A. Ebert-Johnson	:
Debtor/Respondent	:
	:
and	:
	:
Charles J. DeHart, III, Esquire	:
Trustee/Respondent	:
	:

OBJECTION TO CONFIRMATION OF THE PLAN

Movant, U.S. Bank National Association, not in its individual capacity but solely as trustee for the RMAC Trust, Series 2016-CTT c/o Rushmore Loan Management Services (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Bernadette A. Ebert-Johnson (“Debtor”), as follows:

1. As of the bankruptcy filing date of April 25, 2018, Movant holds a secured claim against the Debtor’s property, located at: 835 Hidden Lake Drive, East Stroudsburg, PA 18302.
2. Movant filed a Proof of Claim (“POC”) in the amount of \$26,410.26 for pre-petition arrears on July 3, 2018.
3. The Plan currently does not provide payment to Movant for any pre-petition arrears.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 07/06/2018

/s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Hladik, Onorato & Federman, LLP
298 Wissahickon Avenue
North Wales, PA 19454
Phone 215-855-9521
Fax 215-855-9121